

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

MIAMI DIVISION

JANE DOE,

CASE NO: 1:25-cv-20757 JB

Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

/

PROPOSED PROTECTIVE ORDER

This matter came before the Court on the Plaintiff's motion for permission to proceed under a pseudonym and for a protective order. Based on the motion, the Plaintiff's supporting memorandum, and the entire record in this case, the Court finds there is good cause to enter a protective order as follows:

1. All documents filed with the Court that contain the name of the Plaintiff or information that identifies the Plaintiff or her family members, directly or indirectly, shall be filed under seal. In all publicly filed documents, Plaintiff shall be identified only by her pseudonym.
2. If requested to do so, the Plaintiff's counsel shall disclose the name of the Plaintiff to counsel for the Defendant.
3. Counsel for the Defendant may disclose the identity of the Plaintiff to the named Defendant, employees of the Defendant, and experts retained in this case, but only to the minimum extent necessary to litigation this action.
4. Individuals to whom disclosure of the Plaintiff's identity is made shall not further disclose that information to any other person without first obtaining confirmation from the

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Defendant's counsel that such disclosure is necessary to litigate this action.

5. Any person to whom disclosure is made because of this litigation shall first read this protective order prior to having access to the identity of the Plaintiff. Counsel for the Defendant shall ensure that all persons to whom disclosure is made pursuant to paragraphs 3 and 4 are aware of this protective order.

6. Under no circumstances shall any person disclose the Plaintiff's name to the media without the consent of the Plaintiff's counsel.

7. If any specific issues related to non-disclosure of the Plaintiff's identity arise during the course of litigation, the parties shall seek to resolve those issues without court intervention. If the parties cannot agree, they shall seek further clarification from this Court.

DONE AND ORDERED in Chambers, at Miami, Miami-Dade County, Florida, on _____, 2025.

UNITED STATES DISTRICT JUDGE

cc: All counsel & parties of record